

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JAVELIN LOGISTICS CORPORATION,
AS SUBROGOR AND FOR THE USE AND
BENEFIT OF THROUGH TRANSPORT
MUTUAL INSURANCE ASSOCIATION,
LTD. D/B/A T.T. CLUB,

Plaintiff,

v.

SONIQ SERVICES, INC., d/b/a SONIQ
TRANSPORTATION AND WAREHOUSE,
DHL EXPRESS (USA), INC.,
DHL De GUATEMALA,

Defendants.

Civil Action No. 2:17-cv-00958-MJP

**STIPULATED MOTION AND
[REDACTED] ORDER TO EXTEND
DEADLINE FOR EXCHANGE OF
EXPERT REPORTS**

**NOTE ON MOTION CALENDAR:
FEBRUARY 20, 2018**

I. STIPULATED MOTION

Subject to the Court's approval, Plaintiff, Javelin Logistics Corporation ("Javelin") and Defendants Soniq Services, Inc. ("Soniq"), DHL Express (USA), Inc., and DHL de Guatemala (collectively, "DHL"), by and through their undersigned counsel, hereby stipulate to a 14-day continuance of the deadline for the parties to exchange reports from expert witnesses under

1 FRCP 26(a)(2) as established by the Court's Order Setting Trial Date & Related Dates (ECF
2 No. 27).

3
4 **II. STIPULATION**

5 1. This is a subrogation action that Javelin initiated against Soniq and DHL
6 involving cargo that was allegedly damaged *en route* from the shipper, PCE Paragon Solutions
7 Mexico ("Foxconn") in Guadalajara, Mexico to the consignee in Boardman, Oregon. Javelin,
8 Soniq, and DHL were responsible for different segments of transporting the cargo.

9 2. On December 1, 2017, the Court issued an Order Setting Trial Date & Related
10 Deadlines which set a deadline for the exchange of expert reports of March 19, 2018 (ECF No.
11 27).

12 3. DHL Express and DHL de Guatemala are still in the process of gathering
13 information and documents in relation to this case. At the request of counsel for DHL Express
14 and DHL de Guatemala, counsel for Javelin and Soniq have agreed to a short 14-day
15 continuance of the deadline to exchange expert reports.

16 4. Good cause exists for the continuance pursuant to LCR 16(b)(5). Although the
17 parties are cooperating in discovery, DHL made a late appearance in the lawsuit, and DHL is
18 still in the process of investigating the claims and collecting documents. In addition, several
19 of the relevant fact witnesses from Soniq are no longer Soniq employees and therefore their
20 depositions will need to be secured via compulsory process. Other fact witnesses are located
21 in Guadalajara, Mexico, and additional time will be required to take their depositions. The
22 parties also need time to complete fact discovery before preparing expert reports (or amending
23 expert reports) and taking expert depositions.

5. For these reasons, the parties stipulate and request an order granting the relief from the Court's Order Setting Trial Date & Related Dates (ECF No. 27), and request that the deadline for the exchange of expert reports be continued 14-days until April 2, 2018.

6. Subject to the Court's approval, the parties propose the following date:

<u>Event</u>	<u>Current Date</u>	<u>Proposed Date</u>
Reports from expert witness under FRCP 26(a)(2) due	March 19, 2018	April 2, 2018

DATED this 16th day of February, 2018.

LE GROS BUCHANAN & PAUL

FORSBERG & UMLAUF, P.S.

By: s/

By: s/

By: s/
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 Corporation, as subrogor and for the use and
 benefit of Through Transport Mutual
 Insurance Association Ltd. d/b/a T.T. Club

TYSON & MENDES, LLP

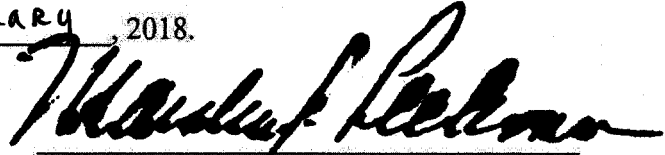
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 Attorneys for Defendants DHL Express
 (USA), Inc. and DHL De Guatemala

ORDER

It is so ORDERED.

DATED this 27th day of February, 2018.



JUDGE MARSHA J. PECHMAN
UNITED STATES DISTRICT JUDGE

Presented by:

TYSON & MENDES, LLP

By: s/

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Attorneys for Defendants DHL Express
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CERTIFICATE OF SERVICE

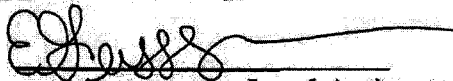
I hereby certify that on February 20, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to The Honorable Marsha J. Pechman, and serve it on all associated counsel.

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I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed at Seattle, Washington this 20 day of February, 2018.


Libbey Geissinger, Legal Assistant